

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

Plaintiff,

v.

ALAN BRAM GOLDMAN;

Defendants.

Civil No. 3:20-cv-1747

Breach Of Contract; Specific
Performance Of Contract;
Reimbursement Of Funds, Costs
And Expenses

Motion for Extension of Time to Amend Pleadings

To the Honorable Court:

Comes Now, Teal Peak Capital, LLC ("Teal Peak"), and through the undersigned attorney, respectfully states and prays:

1. On April 22, 2021, this Honorable Court issued its Case Management Order and established today, May 17, 2021, as the deadline to amend the pleadings.

2. The appearing party wishes to amend its pleadings, but unfortunately the time provided by the Court has been insufficient. The undersigned recently assumed Plaintiff's legal representation, and, despite his best efforts, he has been unable to obtain and review all the information necessary to amend the pleadings. Fortunately, the process should take no more than an additional 11 days.

3. This request should in no way alter the rest of the deadlines set by the Court, cause unwarranted delay, or undue prejudice upon the Defendant. This case just started. Furthermore, Federal Rule of Civil Procedure 15(a) declares that "[t]he

court should freely give leave” to amend the complaint “when justice so requires.” Only when there is “bad faith by the moving party, unwarranted delay, or undue prejudice.” may the Court deny leave to amend. *Rivera v. Garcia*, 192 F.R.D. 57, 58 (D.P.R. 2002) (citing *Colmenares Vivas v. Sun Alliance Ins. Co.*, 807 F.2d 1102, 1108 (1st Cir. 1986)). None of these reasons are present here.

Wherefore, the undersigned respectfully requests from this Honorable Court to extend the time for the parties to amend the pleadings until Friday, May 28, 2021.

Respectfully Submitted.

In San Juan, Puerto Rico, this 17th day of May, 2021.

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the Court’s CM/ECF system, which will send notice of its filing electronically to the attorneys of record.

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